

# Exhibit 43

Linda Loretz, M.D.

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UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

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IN RE JOHNSON & JOHNSON ) MDL No.  
TALCUM POWDER PRODUCTS ) 16-2738 (FLW)(LHG)  
MARKETING SALES PRACTICES, )  
AND PRODUCTS LIABILITY )  
LITIGATION )  
 )  
THIS DOCUMENT RELATES TO )  
ALL CASES )

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V O L U M E I

VIDEOTAPED 30(b)(6) DEPOSITION OF DEFENDANT  
PERSONAL CARE PRODUCTS COUNCIL  
by and through its Designated Representative,

LINDA LORETZ, M.D.

WASHINGTON, D.C.

TUESDAY, JULY 17, 2018

9:10 A.M.

Reported by: Leslie A. Todd

Linda Loretz, M.D.

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<p>1 should probably -- more specifics probably make --</p> <p>2 are clearer than that.</p> <p>3 Q Okay.</p> <p>4 A So minutes related to the Talc</p> <p>5 Interested Party Task Force. Some of the outcomes</p> <p>6 related to the ISRTP, FDA, CTFA workshop,</p> <p>7 published papers.</p> <p>8 Q Published papers?</p> <p>9 A That came out of that workshop as well</p> <p>10 as the planning minutes.</p> <p>11 Submissions to NTP. And again, minutes</p> <p>12 related to -- to that -- that work, and e-mails</p> <p>13 related to these efforts. Some publications</p> <p>14 related to talc and ovarian cancer.</p> <p>15 Q Is that it?</p> <p>16 A No. I mean, we looked at the</p> <p>17 specification -- the talc specifications, CTFA</p> <p>18 talc specification. Response to the citizens</p> <p>19 petition.</p> <p>20 Q Okay.</p> <p>21 A So basically the documents that relate</p> <p>22 to the kind of big events along the way related to</p> <p>23 talc.</p> <p>24 Q Okay. And were all these documents</p> <p>25 provided to you by lawyers?</p>	<p>1 Q -- so that we know exactly what the</p> <p>2 other one is talking about. Do you agree with</p> <p>3 that?</p> <p>4 A Yes.</p> <p>5 Q Okay. So when you say the bulk of</p> <p>6 and maybe this, maybe that --</p> <p>7 A I'm trying to think if I can think of a</p> <p>8 single one that I actually looked at. Like if I</p> <p>9 had a question, what was the outcome of the IARC,</p> <p>10 what was the exact wording on that, that's kind of</p> <p>11 something that I might have looked up.</p> <p>12 Q Okay. You might have looked at.</p> <p>13 Remember the question is, did you look</p> <p>14 up -- do your own investigation at all, did you</p> <p>15 look at anything outside of what these lawyers</p> <p>16 gave you, to do your own investigation in order to</p> <p>17 refresh your recollection to prepare for this</p> <p>18 deposition?</p> <p>19 A I can't think of anything specifically</p> <p>20 that I looked at, no.</p> <p>21 Q Okay. Fair enough. If you think of</p> <p>22 something, will you let me know?</p> <p>23 A I will be happy to.</p> <p>24 Q Okay. All right. You know one thing</p> <p>25 that I noticed while Mr. Golomb was asking you</p>
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<p>1 A Yes.</p> <p>2 Q Did you do any of your own independent</p> <p>3 investigation to refresh your recollection or to</p> <p>4 learn more about the topics you're going to be</p> <p>5 asked to testify about?</p> <p>6 A Not really, no.</p> <p>7 Q Not really? Or not at all?</p> <p>8 A I'm just trying to think. Pretty much</p> <p>9 not at all. Did I look up something because I had</p> <p>10 a thought, was this -- you know, possibly, but</p> <p>11 for -- absolutely the bulk was just in preparation</p> <p>12 with my attorneys.</p> <p>13 Q Okay. Well, listen, I'm -- you know,</p> <p>14 we -- we really need to be precise with each</p> <p>15 other, okay?</p> <p>16 A Okay.</p> <p>17 Q And I'll do my best to ask precise</p> <p>18 questions, and if I don't, please let me know. I</p> <p>19 know your lawyer will do his best to let me know</p> <p>20 when I don't ask a very good question, and by no</p> <p>21 means am I saying I'm good at it. I do my best,</p> <p>22 but I'm always not real good at it. But it's</p> <p>23 important that you and I be precise with each</p> <p>24 other --</p> <p>25 A Mm-hmm.</p>	<p>1 questions was one document in particular, and I</p> <p>2 don't remember which one it was off the top of my</p> <p>3 head -- actually, I think it was Exhibit 4.</p> <p>4 MR. LOCKE: You may want to use this.</p> <p>5 MR. MEADOWS: Is that yours?</p> <p>6 MR. LOCKE: Yes.</p> <p>7 MR. MEADOWS: Exhibit 4 --</p> <p>8 MR. LOCKE: Oh, no, no, that's 5. This</p> <p>9 is 4.</p> <p>10 MR. MEADOWS: You know what, I think it</p> <p>11 was Exhibit 5 as well.</p> <p>12 BY MR. MEADOWS:</p> <p>13 Q Both of those exhibits, I believe you</p> <p>14 testified that you had never seen them before?</p> <p>15 A I think what I -- no. I think what I</p> <p>16 testified to is I don't recall ever seeing this.</p> <p>17 This looks like something somebody faxed to us</p> <p>18 unsolicited. I don't know who it went to. I</p> <p>19 don't believe I reviewed this in my preparation.</p> <p>20 MR. LOCKE: And -- and let the record</p> <p>21 reflect the witness is identifying Exhibit 4 when</p> <p>22 she refers to "this."</p> <p>23 MR. MEADOWS: Okay.</p> <p>24 THE WITNESS: And then this is obviously</p> <p>25 an e-mail I wrote, so obviously I have seen it</p>

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<p>1 before because I wrote it. Did I look at it in my 2 preparation for this, I'm honestly not sure. It 3 certainly looks like a normal e-mail and we looked 4 at these types of e-mails. Did I look at this 5 specific one, I may well have. 6 BY MR. MEADOWS: 7 Q Okay. But you would agree that 8 Exhibit 4 -- 9 MR. LOCKE: Can I -- can I just say the 10 second "this" that the witness was referring to 11 was Exhibit 5. 12 MR. MEADOWS: You may. 13 MR. LOCKE: Okay. 14 BY MR. MEADOWS: 15 Q Exhibit 4, that is a document from the 16 PCPC files, correct? 17 A That's what it says on it, yes. 18 Q Right. And you just pointed down in 19 the -- 20 A Yep. 21 Q -- bottom right-hand corner, right? 22 A Yes. 23 Q And then there is a Bates -- what we 24 call a Bates stamp number there, correct? 25 A Yes, correct.</p>	<p>1 Q And you agree that that is an e-mail 2 that you wrote. 3 A Yes. 4 Q Okay. But did you ever -- did you see 5 that document in any of the documents that your 6 lawyers gave to you? 7 A I may have. I simply don't recall. 8 Because it's a very -- I mean, this is the kind of 9 thing that I wrote, these are the kind of 10 documents we reviewed. Did I review this specific 11 one, I may well have. 12 Q I'll represent to you that I looked for 13 that document in the PCPC production, and I did 14 not find it. Would that surprise you? 15 A No. 16 Q No? Why does that not surprise you? 17 A I -- we have -- I -- I don't know that 18 we would keep this document. 19 Q You don't know that you would keep your 20 e-mails? 21 A We have a document retention policy, I 22 believe, when we're -- we keep them for a certain 23 amount of time, but not -- 24 Q What is that policy? 25 A I'm not sure.</p>
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<p>1 Q And it's got -- it uses the, I believe, 2 the letters PCPC on it, right? 3 A Correct. 4 Q So it's a document that came from the 5 PCPC corporate files, correct? 6 A Yes. 7 Q And you're here today to testify as a 8 corporate representative on behalf of PCPC, 9 correct? 10 A That is correct. 11 Q And you say you've never seen that 12 document before? 13 A I'm saying I do not recall seeing it. 14 Q Okay. 15 A I have not seen it in my preparation. I 16 think that I would remember. 17 Q Okay. And with respect to Exhibit 18 No. 5, I don't think that came from a PCPC file, 19 did it? 20 A It did not. It says Imerys. 21 Q It says Imerys? 22 A Yes. 23 Q Okay. But it is an e-mail that you 24 obviously wrote, correct? 25 A Correct, yes.</p>	<p>1 Q Okay. Who would know? 2 A It's a legal department policy. 3 Q Okay. So who -- who in your company 4 would know the most about the document retention 5 policy with respect to e-mails? 6 MR. LOCKE: Objection. Beyond the 7 scope. 8 BY MR. MEADOWS: 9 Q Do you know? 10 A Our legal department. 11 Q Your legal department. Okay. 12 So if I want to talk to somebody about 13 e-mails that don't seem to have been produced to 14 us, that would be someone in your legal 15 department. 16 MR. LOCKE: Objection. Beyond the scope 17 and to form. 18 BY MR. MEADOWS: 19 Q Is that correct? 20 A They know the most about the document 21 retention policy, yes. 22 Q Okay. When did that document retention 23 policy come into effect, do you know? 24 A I really -- 25 MR. LOCKE: Objection --</p>

30 (Pages 114 to 117)